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*Proposed Counsel for the Official Committee
Of Unsecured Creditors*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	Chapter 11
	:
REPUBLIC METALS REFINING	Case No. 18-13359 (SHL)
CORPORATION, <i>et al.</i> , ¹	:
	(Jointly Administered)
Debtor,	:
	:
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**NOTICE OF PRESENTMENT OF ORDER GRANTING
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION
FOR AN ORDER PURSUANT TO BANKRUPTCY RULE 2004
AUTHORIZING DISCOVERY OF THE DEBTORS AND THIRD PARTIES**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Republic Metals Refining Corporation, 15 West 47th Street, Suites 206 and 209, New York, NY 10036 (3194), Republic Metals Corporation, 12900 NW 38th Avenue, Miami, FL 33054 (4378), Republic Carbon Company, LLC, 5295 Northwest 163rd Street, Miami Gardens, FL 33014 (5833), Republic High Tech Metals, LLC, 13001 NW 38 Avenue, Miami, FL 33054 (6102), RMC Diamonds, LLC, 12900 NW 38th Avenue, Miami, FL 33054 (1507), RMC2, LLC, 12900 NW 38th Avenue, Miami, FL 33054 (4696), J & L Republic LLC, 12900 NW 38th Avenue, Miami, FL 33054 (7604); R & R Metals, LLC, 12900 NW 38th Avenue, Miami, FL 33054 (7848), Republic Metals Trading (Shanghai) Co., Ltd., 276 Ningbo Road, Huangpu District, Shanghai, P.R. 200001 China (1639), and Republic Trans Mexico Metals, S.R.L., Francisco I. Madero No. 55 Piso 5, Local 409, Centro Joyero Edificio Central, Delegación Cuauhtémoc, Mexico DF 6000 (2942).

PLEASE TAKE NOTICE that the Official Committee of Unsecured Creditors (the “Committee”), through its undersigned proposed counsel, will present the attached proposed order granting the *Official Committee of Unsecured Creditors' Motion for an Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery of the Debtors and Third Parties* (the “Order”) to the Honorable Sean H. Lane of the United States Bankruptcy Court for the Southern District of New York, for signature and entry on **December 19, 2018 at 11:00 a.m.**

PLEASE TAKE FURTHER NOTICE that objections, if any, to the proposed Order must: (i) be made in writing, (ii) state with particularity the grounds therefore, (iii) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with proof of service, with a courtesy copy delivered to the Chambers of the Honorable Sean H. Lane, One Bowling Green New York, New York 10004; and (iv) served upon (a) proposed counsel for the Committee, Cooley LLP, 1114 Avenue of the Americas, New York, New York 10016 (Attn: Seth Van Aalten, Esq. and Ian Shapiro, Esq.) (b) the Debtors, c/o Republic Metals Refining Corporation, (Attn: Scott Avila); (c) the attorneys for the Debtors, Akerman LLP, 2001 Ross Avenue, Suite 3600, Dallas, TX 75201 (Attn: Andrea S. Hartley, Esq. and Katerhine C. Fackler, Esq.); (d) the Office of the United States Trustee for the Southern District of New York, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Shannon Scott, Esq.); so as to be received no later than **10:00 a.m. (prevailing Eastern Time) on December 19, 2018 (the “Objection Deadline”).**

PLEASE TAKE FURTHER NOTICE that if no response or objections are received by the Objection Deadline, the proposed order may be signed without a hearing.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed and served by the Objection Deadline, a hearing may be held before the Honorable Sean H. Lane, at

a date to be scheduled by the Court, upon such additional notices as the Court may direct. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: December 14, 2018
New York, New York

COOLEY LLP

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